



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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March 22, 2018

**VIA ECF**

Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Justin Kuchma v. The City of New York, et al.,  
16 CV 7830 (LTS)

Your Honor:

I am a Deputy Chief in the Special Federal Litigation Division of the New York City Law Department which represents defendant City in the above-referenced matter. For the reasons set forth below, defendant City writes to advise the Court that, for the reasons set forth below, defendants have written the assigned mediator to request an adjournment of the mediation currently scheduled for March 30, 2018. Plaintiff's counsel consented to that request.

Defendants' request for the adjournment of the mediation is necessitated because the ACC previously defending this matter very recently and abruptly left the employ of the Law Department. The undersigned only became aware of the upcoming mediation this afternoon as I was reviewing the cases that had been handled by the former ACC and when plaintiff's counsel, upon learning that the former ACC is no longer with this office, reached out to me to advise that the mediation statement was due today. This office is now in the process of re-assigning this and other matters and the ACC to whom this matter will be assigned will enter a Notice of Appearance shortly. However, it will take new defense counsel sometime to review the file such that s/he can review the file, request authority, if appropriate and meaningfully participate in the mediation.

Thank you for your time and consideration herein.

Respectfully submitted,

/s/

Elizabeth Dollin

*Deputy Chief*

cc: Danielle B. Sullivan, Esq. (BY ECF)  
SDNY Mediation Office (by email)